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**VIA EMAIL (cho\_chambers@nyed.uscourts.gov)**

Hon. James R. Cho  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

**Re: *Karnes et al., v. City of New York et al.*, 21-CV-4903 (E.D.N.Y.)**

Dear Judge Cho:

As the Court is aware, we represent Plaintiffs in the above-captioned matter. The plaintiffs write to request another week to consider Your Honor's offer. The reason we request this additional time is to run down if there is going to be a lien asserted by HMS/Gainwell, the State administrator of the Medicaid program.

We received a no lien letter in late 2021, but Ms. Petree has received medical treatment which could potentially be subject to a lien. We did request this information from HMS/Gainwell prior to our settlement conference. We have reached out to them informally (as we have contacts there who are helpful) but have not received a response. Should a response not be forthcoming promptly, we will apply to Your Honor for a subpoena to receive this information.

As noted above, we request an additional week to respond to Your Honor's recommendation. Further, we request our proposed schedule be submitted a week after our response to the recommendation. We have been discussing all of this with Mr. Francolla and he consents to these requests.

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We thank Your Honor for your time and attention to this matter. Should you wish this request to be placed on the public docket, we would be happy to, as it was not apparent to me if that would be more appropriate.

Respectfully submitted,



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